

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MARILYN KUNELIUS,

Plaintiff,

v.

TOWN OF STOW, et al.

Defendants.

Civil Action No. 05-11697-GAO

**MOTION OF THE TRUST FOR PUBLIC LAND AND CRAIG A. MACDONNELL FOR
LEAVE TO FILE MEMORANDUM IN EXCESS OF TWENTY PAGES**

Pursuant to Local Rule 7.1(b)(4), Defendants The Trust for Public Land and Craig A. MacDonnell (collectively, “TPL”) respectfully request leave of the Court to file a memorandum in opposition to Plaintiff’s motions for summary judgment in excess of 20 pages. As grounds for this motion, TPL states that a memorandum in excess of twenty pages will allow it to respond to Plaintiff’s 57-page summary judgment brief, which the Court granted Plaintiff leave to file on October 24, 2007. TPL further states that filing a memorandum in excess of twenty pages will allow it to respond, in one memorandum, to Plaintiff’s three motions for summary judgment against TPL, Craig MacDonnell and the “partnership of unknown name between Town of Stow and The Trust For Public Land.” Defendants’ memorandum will be no longer than 30 pages, and the additional pages will aid the Court in its consideration and determination of the motions for summary judgment.

WHEREFORE, TPL respectfully requests that this Court grant leave for it to file a memorandum in opposition to Plaintiff’s motions for summary judgment in excess of 20 pages.

Respectfully submitted,

THE TRUST FOR PUBLIC LAND and
CRAIG A. MACDONNELL

By their attorneys,

/s/ Patricia M. Murphy
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Dated: November 14, 2007

LOCAL RULE 7.1 CERTIFICATE
AND CERTIFICATE OF SERVICE

I, Patricia M. Murphy, counsel for Defendant The Trust for Public Land and Craig A. MacDonnell, hereby certify that I conferred with counsel for Plaintiff Michael McLaughlin in an attempt to narrow the issues in this motion prior to filing but the parties were unable to reach agreement.

I further certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on November 14, 2007.

s/ Patricia M. Murphy
Patricia M. Murphy